2100 Second Street, S.W. Washington, DC 20593-0001 Phone: (202) 267-1907

COMDTNOTE 16478

NOV 2 1995

COMMANDANT NOTICE 16478

CANCELLED: NOV | 1996

Subj: CH-2 TO COMDTINST M16478.1B, HAZARDOUS WASTE MANAGEMENT MANUAL

- 1. <u>PURPOSE</u>. This notice publishes revisions to Commandant Instruction M16478.1B.
- 2. <u>ACTION</u>. Area and district commanders, commanders of maintenance and logistics commands, and commanding officers of headquarters units shall ensure compliance with the provisions of this Manual.
- 3. PROCEDURES. Remove and insert the following pages:

Remove

United States Coast Guard

Insert

Page iii Page 4-21 thru 4-22 Chapter 12 Enclosure (6) Page iii CH-2 Page 4-21 thru 4-22, CH-2

Enclosure (6) CH-2

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- 4. <u>SUMMARY OF CHANGES</u>. Revised changes are summarized as follows:
 - a. The Table of Contents shows changes to the manual's organization.
 - b. Chapter 4 contains a change in the reporting requirements reference for underground storage tanks.

c. Chapter 12 has been removed.

Logistics and Development

Encl: (1) CH-2 to COMDTINST M16478.1B

CHAPTER	10.	PERSONNEL	TRAINING
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B. C. D.	A. Required Training										
CHAPTER	11. SH	IPBOAR	D HAZARDOUS WASTE								
В.	Specia	oils.	rmation								
ENCLOSU	RES:	(2) (3) (4) (5) (6) (7) (8) (9)	Regional Offices State Hazardous Waste Offices List of Agencies Designated to Receive Notifications EPA Form #8700-12, Notification of Regulated Waste Activity Intentionally Left Blank								

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- 4.N.5. Exceptions to Reporting. On-Scene Coordinators for spill cleanups who possess a Generator I.D. number are not subject to the biennial reporting requirements.
 - 6. <u>Underground Storage Tanks</u>. Registration and reporting requirements for underground storage tanks (UST's) are discussed in the Storage Tank Management Manual, COMDTINST M5090.9.

7. Exception Reports.

- a. Generators who don't receive a copy of the signed manifest from the owner or operator of the designated TSDF within 35 days of the date of the shipment must contact the transporter and/or the owner or operator of the designated TSDF to determine the status of the hazardous waste. (Note that time limits for this requirement vary from state to state). This action (phone call) should be recorded in an appropriate log.
- b. Large Quantity Generators must submit an Exception Report to the EPA Regional Administrator if they have not received a copy of the manifest with the signature of the owner or operator of the designated TSDF within 45 days (also varies by state) of the date of the shipment.
- c. Small Quantity Generators must submit an Exception Report to the EPA Regional Administrator if they have not received a copy of the manifest with the signature of the owner or operator of the designated facility within 60 days (also may vary by state) of the date of the shipment.
- d. The Exception Report must include:
 - A legible copy of the manifest for which the generator does not have confirmation of delivery.
 - (2) A cover letter signed by the generator or his authorized representative explaining the effort he has taken to locate the hazardous waste and the results of those efforts.
 - (3) Copies of all exception reports shall be submitted to your servicing CEU.
- 8. <u>Inspection Logs</u>. Generators shall maintain a written log which records the findings of weekly container inspections. See Section D. of Chapter 8.

- 4.N.9. <u>Training Records</u>. Records documenting the training of all personnel handling or managing hazardous waste need to be maintained by generators. See Section C of Chapter 10 for detail (40 CFR 265.16).
- O. Defense Reutilization and Marketing Service (DRMS).
 - 1. The Coast Guard has an agreement with the Defense Reutilization and Marketing Service (formerly Defense Property Disposal Service (DPDS)), to provide hazardous waste disposal service to Coast Guard facilities on an identifiable cost basis. All CG units wishing to use DRMS must be on the local Defense Reutilization and Marketing Office (DRMO) pick up list.
 - Various Defense Reutilization and Marketing Offices (DRMO's) of the DRMS operate differently. It is however, a fairly uniform practice to require submission of DOD Form DD-1348-1 for each pickup/shipment of waste. A more detailed explanation of turn-in requirements is provided in the Property Management Manual, COMDTINST M4500.5.
 - 3. All units are required to provide a Hazardous Waste Profile Sheet (HWPS) DRMS Form 1930 with all turn-ins of HW (see Figure 4-7). The profile sheets are required annually for each waste stream. Consult with your servicing CEU or DRMO if you have questions concerning completion of the HWPS.
 - 4. DRMO practices and/or advice which appear inconsistent with Federal or state regulations shall be reported to Commandant (G-ECV) (202) 267-2345. For example, a local DRMO may request that a unit deliver hazardous wastes as hazardous material without manifesting the shipment. This practice is inconsistent with EPA regulations and should not be agreed to.
 - 5. Consult with your servicing CEU prior to initiating use of DRMS contractors.
 - 6. Each unit using DRMO for disposal is responsible for ensuring appropriate funds are available from unit funds (AFC-30).

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